
EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ROBERT CYRUS,

Plaintiff,

vs.

**HYUNDAI MOTOR COMPANY,
HYUNDAI MOBIS, INC. (formerly known as
HYUNDAI PRECISION CO), HYUNDAI
TRANSEAD (formerly known as
HYUNDAI PRECISION CO), HYUNDAI
MOTOR AMERICA, and HYUNDAI
MOTOR MANUFACTURING OF
ALABAMA, LLC,**

Defendants.

CIVIL ACTION NO. 2:06-CV-568-DRB

DECLARATION OF EILEEN EIMERMANN

1. My name is Eileen Eimermann. I am a resident of the State of California, over the age of nineteen years and otherwise competent to give this Declaration. The facts contained in this Declaration are based upon my personal knowledge.


2. I am the Hyundai Motor America National Manager, Compensation & Benefits. I have held this position since April 1, 2001 (Mgr, Compensation & Benefits from March 9, 1999 to April 1, 2001). I have knowledge of the benefits Robert Cyrus received as an employee of Hyundai Motor America ("HMA"). Mr. Cyrus was hired by HMA in the Spring of 2002. During the time he worked for HMA, he participated in the Life and Medical Plan of Hyundai Motor America, Plan 501, where HMA served as the plan sponsor.

3. The Life and Medical Plan of Hyundai Motor America, Plan 501 is regulated exclusively by the Employment Retirement Income Security Act of 1974 ("ERISA"). HMA is the plan sponsor and plan administrator for this group health care plan. Mr. Cyrus was participating in this plan and eligible to receive benefits under the plan as an employee of HMA.

4. Aside from the ERISA regulated health care plan there are several additional ERISA regulated benefits at HMA that may be implicated by Mr. Cyrus' reference to a "benefit package." The ERISA governed plans offered by HMA are limited to: a life insurance plan; a health insurance plan; a short term disability; a long-term disability plan; and a 401(k) plan and pension plan which provide retirement benefits.

5. Each of these plans have been established and are maintained by HMA for the purpose of providing the stated benefits to the employee participating in the plans. These plans only provide ERISA benefits to the employees under circumstances such as sickness, accident, disability, death or retirement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct this 27th day of July, 2006.



Eileen Eimermann